

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 05-CR-40027-FDS
v.)	
)	
DARRYL YOUNG,)	
Defendant.)	

JOINT SUBMISSION OF THE PARTIES UNDER LOCAL RULE 116.5(A)

Pursuant to Local Rule 116.5(A), the parties state as follows:

(1) Timing Requirements Under L.R. 116.3

The parties do not request relief from the otherwise applicable timing requirements imposed by L.R. 116.3.

(2) Expert Discovery under Fed.R.Crim.P. 16(a)(1)(E)

The parties have requested discovery of each other concerning expert witnesses. The government will provide such discovery twenty eight days prior to trial. Defendant will provide reciprocal discovery fourteen days prior to trial.

(3) Additional Discovery

All Rule 16 and automatic discovery materials have been provided to defendant's counsel or made available for counsel's review. The parties anticipate some additional discovery. The undersigned government attorney has recently been assigned to this case. The government is reviewing the discovery provided and will produce additional reports, if any, upon receipt of

them. Nevertheless, any newly discovered evidence shall be disclosed pursuant to the Local Rules.

(4) Motion Date

The parties request that the date for the defendant to file pretrial dispositive motions be set at the Final Status Conference that is requested below.

(5) Periods of Excludable Delay

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and jointly submit that the following periods are excludable:

11/03/05-4/19/06: Automatic discovery/interests of justice

The parties are requesting that the time between the filing of this status report and the date of the Final Status Conference should be excluded under the Speedy Trial Act, to allow the parties sufficient time to explore disposition of this case short of trial. Exclusion of such time is in the interests of justice.

As of the final status conference, 0 days will have been counted and 70 days will remain under the Speedy Trial Act.

(6) Whether Trial is Anticipated; Length of Trial

It is too early for the parties anticipate whether there will be a trial.

(7) Date for Future Status Conferences

The parties request that a date for the final status conference be selected at the Intermediate status conference to determine a date and time convenient for all parties and the Court.

Respectfully submitted,

JAMES G. REARDON, JR., Esq.

MICHAEL J. SULLIVAN
United States Attorney

/s/ James G. Reardon, Jr.
for defendant Darryl Young

By: /s/ Suzanne M. Sullivan
SUZANNE M. SULLIVAN
Assistant U.S. Attorney

April 17, 2006

CERTIFICATE OF SERVICE

This is to certify that I have this date served upon the person listed below a copy of the foregoing document via electronic filing:

Attorney James G. Reardon, Jr.
Reardon & Reardon
1 Exchange Place
Worcester, MA 01608

This 17th day of April, 2006.

s/ Suzanne M. Sullivan
SUZANNE M. SULLIVAN
Assistant U.S. Attorney

